

Gabriel Del Virginia, Esq. (GDV-4951)
LAW OFFICES OF GABRIEL DEL VIRGINIA
*Proposed Attorneys for the Debtor
and Debtor in Possession.*
30 Wall Street-12th Floor,
New York, New York 10005.
Telephone: 212-371-54712
Facsimile: 212-371-0460
gabriel.delvirginia@verizon.net

Presentment Date: January 5, 2015.
Presentment Time: 12:00 noon

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re

Chapter 11

Jaleh Elghanian,
A/K/A Jaleh Ebrhahimzadeh,

Debtor.

Case No. 14-B-13377-REG

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**MOTION FOR AN ORDER EXTENDING THE DEBTOR'S TIME TO
FILE SCHEDULES OF ASSETS AND LIABILITIES, STATEMENTS OF FINANCIAL
AFFAIRS AND LISTS OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES
AND CREDIT COUNSELING.**

**TO: THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE**

The application of Jaleh Elghanian, A/K/A Jaleh
Ebrhahimzadeh, the above-captioned debtor and debtor-in-
possession (the "Debtor"), respectfully represents:

BACKGROUND.

1. The Debtor filed her voluntary petition for relief under chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§101 *et seq.* (the "Bankruptcy Code") on December 11, 2014 (the "Petition Date"). The Debtor continues to manage her property as a debtor and debtor-in-possession. No trustee or examiner has been appointed in this case. Also, no official committee of unsecured creditors has been appointed.

2. The Debtor is an individual who, with her son, David Ebrhahimzadeh, co-owns a condominium apartment at 333 East 34th Street, Unit 14J, in the borough of Manhattan, City of New York (the "Premises").

3. The Debtor's need to seek relief in this Court is occasioned by the threatened foreclosure sale by Board of Managers of Devon Condominium, the condominium board of the Premises.

4. Accordingly, the Debtor has fallen behind on her obligations to the Board.

5. While operating under the protection of this Court, the Debtor and her son hope to identify and negotiate with prospective investors or purchasers as a means to emerging from bankruptcy promptly.

RELIEF REQUESTED.

6. For the reasons set forth below, the Debtor seeks in the instant Motion, entry of an order, extending her time to file respective schedules of assets and liabilities (the "Schedules"), statements of financial affairs ("Statements") and lists of executory contracts and unexpired leases, ("Lists") and Credit Counseling, through and including January 29, 2015.

BASIS FOR RELIEF REQUESTED.

7. Pursuant to Rule 1007(c) of the Federal Rules of Bankruptcy Procedure, the initial time within which the Debtor must file her Schedules, Statements and Lists expires on December 29, 2014. Debtor also requested a 30-day extension to file her certificate of credit counseling. The Debtor now respectfully requests an extension - to January 29, 2015 - to file the documents.

8. The Debtor, whose principal place of residence is in Burlington County, New Jersey, had very scant time to assemble and prepare the information necessary to complete the Schedules, Statements and Lists before the filing of the Debtor's Chapter 11 case, as a foreclosure sale loomed, and her son, located in New York, attempted to resolve the matter. Thus, the Petition was filed on an emergency basis as a result of a threatened eviction.

9. Given the requested additional time, the Debtor and her son, with proposed counsel will work to prepare the Schedules, Statements, and Lists to reflect accurately the financial circumstances of the Debtor as of the Filing Date. To reiterate, however, due to the aforementioned constraints of time and resources, the Debtor will require additional time to prepare the Schedules, Statements and Lists.

10. Accordingly, this Motion is being submitted to obtain an extension, through and including January 29, 2015, of the time in which the Debtor may file her Schedules, Statements, and Lists, without prejudice to the Debtor's right to seek further extensions for cause.

CONCLUSION.

11. Although no committee of unsecured creditors has been appointed or designated herein, this Motion has been submitted to the Office of the United States Trustee. The Debtor respectfully submits and requests that this Court so find that no further notice is required.

12. No previous application for the relief requested herein has been made to this or any other Court.

13. The Debtor respectfully submits that no new or novel issue of law with respect to the matters contained herein is presented, and that no controversial issue of fact is raised and respectfully requests that the requirement of a memorandum of law, pursuant to The Local Bankruptcy Rules, be waived.

WHEREFORE, the Debtor respectfully requests entry of an order granting the extension of time to file her Schedules, Statements and Lists, and credit counseling through and including January 29, 2015.

Dated: New York, New York
December 23, 2014.

Jaleh Elghanian
Debtor and Debtor in Possession

LAW OFFICES OF GABRIEL DEL VIRGINIA
*Proposed Attorneys for the Debtor
and Debtor in Possession*

By: */s/ Gabriel Del Virginia*
Gabriel Del Virginia (GDV-4961)
30 Wall Street-12th Floor,
New York, New York 10005.
Telephone: 212-371-64712
Facsimile: 212-371-0460
gabriel.delvirginia@verizon.net